

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

YUSEF SALAAM,  
ANTRON BROWN,  
KEVIN RICHARDSON,  
RAYMOND SANTANA, and  
KOREY WISE,

Plaintiffs,  
v.

DONALD J. TRUMP,  
Defendant.

Case No. 2:24-cv-005560-WB

**MOTION FOR LEAVE TO FILE BRIEF AS *AMICI CURIAE***

Non-Parties the ACLU of Pennsylvania, Americans for Prosperity Pennsylvania, Electronic Frontier Foundation, Foundation for Individual Rights and Expression, Institute for Free Speech, Pennsylvania Association of Broadcasters, Pennsylvania NewsMedia Association, Radio Television Digital News Association, Reporters Committee for Freedom of the Press, and Student Press Law Center hereby move for leave to appear as *amici curiae* and file a brief in connection with the pending motion to dismiss filed by Defendant Donald J. Trump. The proposed brief is not in support of either party and takes no position regarding that motion or the merits of this case. Instead, *amici* seek to file the brief for the sole purpose of advocating that, if applicable, the substantive provisions of the recently enacted Pennsylvania Uniform Public Expression Protection Act – namely, its immunity and fee-shifting provisions – can be applied in federal court. In support of the Motion, *amici* rely on the attached Memorandum of Law and their proposed Brief, which is attached as an exhibit thereto.

Undersigned counsel has conferred with counsel for Plaintiffs and Defendant about this Motion and the filing of the proposed Brief. Plaintiffs intend to oppose the Motion, and Defendant consents to the Motion.

WHEREFORE, the *amici curiae* respectfully request that the Court enter an order granting their Motion and allowing them to file their proposed Brief in this case.

Dated: January 15, 2025

Respectfully submitted,

BALLARD SPAHR LLP

By: /s/ Michael Berry  
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**CERTIFICATE OF SERVICE**

I hereby certify on this 15th day of January, 2025 that I caused a true and correct copy of the foregoing Motion for Leave to File Brief as *Amici Curiae*, as well as the accompanying Memorandum of Law, Proposed Order, and Proposed Brief, to be served via the Court's CM/ECF system on to all counsel of record.

/s/ Michael Berry

Michael Berry